BEFORE COMMISSIONERS APPOINTED

BY THE WAIKATO REGIONAL COUNCIL IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of the First Schedule to the Act
AND	
IN THE MATTER	of Waikato Regional Plan Change 1- Waikato and Waipā River Catchments and Variation 1 to Plan Change 1
AND	
IN THE MATTER	of submissions under clause 6 First Schedule
Submitter	**Anna Gioia Nelson, Blair James Nelson, Jonathon James Nelson and Kaye Diane Nelson trading as "Nelson Farms Partnership"**

HEARING STATEMENT OF Anna Gioia Nelson

21.05.2019

Anna Nelson
0274900501
muntanelson@gmail.com

Scope of statement

1.This statement introduces our farming business and the values that drive our business. It outlines which parts of the proposed Plan we consider to be challenging to align with our farming values and management. I will outline some alternative solutions to meet the Plans objectives and briefly give some history of effective actions already taken on farm.

2.Specifically I will focus on;

i. The lack of certainty for our business and our community beyond the first 10 years of the Plan
ii. Farm Environment Plans
iii. Nitrogen Reference point and nutrient management
iv. Stock Exclusion

Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

3.Nelson Farm Partnership is a family farming operation based in Aria in the King Country adjacent to the Mokau river. It involves 3 generations working together on farm – my parents in-law Jon & Kaye, my husband Blair and myself, and our 3 secondary school aged children, Molly, Gus and Jono.

4.Our business aspires to supply the best quality food and fibre to the worlds most discerning consumers. A thriving community, family and the land we farm are core to our vision of success and what drives us. The maori principles of kaitiakitanga and whanaungatanga align closely to our values of caring for our environment and family now and for generations to come.
"We do not inherit this land from our parents, we borrow it from our children".

5.Blair and I are active in our local community, he is the Lead farmer for the Lower Mokau sub-catchment group. I have a part-time role as Co-ordinator for King Country River Care Inc. I have recently been appointed as an Associate Director for Beef + Lamb NZ for this year.

6.Jon and Kaye first purchased land in the valley 51 years ago. The family have gradually added blocks to build to the current 1166ha.

7.We farm with sheep and beef in a roughly 50:50 split. We have high performance breeding ewes and beef cows and a significant finishing operation on the easier country. We utilise a summer cropping program to grow quality feed and are very aware of managing the environmental impacts around this.

8.The property is well developed with 58ha of mature and regenerating native bush and 23ha in pine plantation or recently harvested pine. Large sections of waterways have been fenced and riparian planted. We have utilised space planting of poplars and willows for many years to help stabilise our steeper country.

Every paddock has reticulated water from gravity systems backed up by pump water from the Mokau River.

9.Blair completed one of the first BLNZ Land and Environment Plans to Level 3 (LEP3) without consultant support back in 2010. The family have been involved in many environmental initiatives including Green Project, Green Tick and the Mahoenui/Aria Landcare group. We have completed Overseer budgets in 2010 and 2016.

10.If you refer to the attached Nelson Farms Partnership Farm Plan you will see further farm details; there are twelve different Land Use Capability (LUC) units and 9 dominant soil types identified in the farm scale land resource survey. The LUC units range from versatile Class 2 flats to steep Class 7 hill country.

9%	Class 2
11%	Class 3
7%	Class 4
64%	Class 6
8%	Class 7

In summary the hill country geology comprises of Mahoenui clay with patches of Maeroa ash. The easier hill country and rolling slopes are also formed from Mahoenui clay with larger areas of overlying Maeroa ash, while the lower valleys and terraces are formed from river silt and some ash.
There is a variety of erosion present, including soil slip, gully, sheet, earthflow, slump, deposition and streambank erosion.
The property contour comprises approximately 17% flat to undulating land, 23% rolling to strongly rolling downlands and 60% moderately steep to steep hill country.
There were 10,233 stock units wintered to June 2017, with a stocking rate of 9.4 su/ha from an effective area of 1083.0 ha.
Average rainfall over the last 10years is 1600mm.

11.Over the past 50 years the family have substantially changed the way they farm. Lambing percentage has lifted from 100% to this year 165%. We have lifted and now lowered our stocking intensities. We have dropped our sheep numbers back by about 25% from peak to cope with the extra lambs we are now producing. Breeding cow numbers have also reduced by about one third in recent years, mostly replaced by younger, lighter cattle. We started as grass only, added summer cropping, then added winter cropping and now are reducing cropping inputs significantly again.
To make these changes in the way we farm we have needed to be flexible; we have changed with changing markets, with seasonal variation and when considering our environmental impact.

12.Whilst we are not farming in the Waikato – Waipa catchments we believe that Plan Change One and the amendments to it as a result of this submission process will directly impact on us. Firstly, as precedents set for the West Coast catchments in the next implementation phase and secondly as the indirect effects on our wider Waikato community; we all need vibrant, thriving, confident, collaborative rural communities and the proposed Plan as it stands threatens this.

Figure 1. Nelson Farms Partnership – our land and animals

Figure 2. Nelson Farms – our people

Specific parts of the Plan I am commenting on;

i. Lack of Certainty

13.We support Objective 4 in relation to providing for People and community resilience, however as currently proposed the objective fails to provide this outcome. The Plan states that achieving environmental and cultural outcomes will be costly and as currently proposed PC1 will not achieve its objectives and further plan changes including increasing stringency of land use controls will be required (Objective 4b).
The outcome is a plan which fails to provide communities and individual's certainty about what will be required of them in the future beyond the first 10-year period particularly for us in relation to the environmental requirements and proposed nutrient allocation methodology

14.Our 3 teenage children are indicating a desire to be involved in our farming business; as we look to include them in planning there is discussion regarding diversification, the future of farming and our community. To maintain resilience in our business we need to be able to diversify incomes going forward and we need confidence that legislative changes will be logical and allow timeframes for our business to adapt proactively. Where significant changes to how we farm are required a 10-year time frame is inadequate.
A 25-30year rolling plan with updates every 10 years would be more appropriate for our business to evolve.

15.Having a plan set to achieve an outcome of clean water in 80 years' time but broken up into 10-year blocks will give us limited confidence for the future of our family business with regards to investment as well. How do we justify spending further money fencing and improving land if we are uncertain as to whether we might be required to plant large areas of our farm in trees 10 years later? That investment will be wasted.
WRC and central government through 1Billion trees have significant afforestation planned on hill country farms to get the water quality and carbon neutrality outcomes that they desire. If this goes ahead it will have substantial detrimental impacts on our small rural communities.

ii. Farm Environment Plans

16.We support Farm environment Plans (FEPs) or Land and Environment Plans (LEPS) based on understanding a farms natural capital or resources, identifying and managing critical source areas and understanding and managing emissions pathways. We are concerned the proposed FEP as described in PC1 is too prescriptive (standards, rules, timeframes), it needs to be more adaptive and flexible and "owned" by the farmer with understanding of specific local issues.
This approach ties in closely with a catchment scale planning approach.

17.LEPs supported by B+LNZ, offer a tailored approach to understanding and categorising a farm's natural capital assets (geology, topography, soils, climate, biodiversity, and water resources), and identifying and managing environmental risks. The plans are also useful in ensuring that decisions are prioritised in line with business, family, social and cultural goals.

18.The key environmental issues actively identified and managed through LEPs include those contaminants which can flow overland to surface waterbodies, such as phosphorus, sediment, and pathogens, as well as identifying areas of the farm which may be susceptible to erosion and nitrogen losses.
The LEP can also help identify areas of the farm which have high biodiversity values such as native vegetation, or other values such as cultural values. Active management of Greenhouse gas emissions could also be included.
A well prepared LEP captures stewardship and sustainability in relation to the farming enterprise. It provides an understanding of the natural resources on a farm and allows all those involved with the farm business to understand the plan to manage them for the long term.

19.The benefits of a LEP include:
- Providing a stock take of a farm's natural capital assets such as soil, geology, climate, biodiversity, and freshwater resources along with on farm Land Use Capability (LUC) mapping (1: 5,000 to 1: 10,000);
- Identifying land management units and their strengths and limitations;
- Identifying sensitive habitats and critical source areas;
- Identifying improvements in farming practice that will enhance production, futureproof the business and foster access to environmentally discerning markets;
- Providing evidence for on-farm sustainable practices to consumers, regulators and others;
- If actions and timeframes for their achievement are written down, they are more likely to be completed;
- The potential to add value to a farm;
- Integration with farm business plans and farmer driven future strategic planning;
- Helping to meet regional council requirements to manage threats to water quality.

20.A key attribute of the BLNZ LEP programme is that a farmer can produce an LEP Level 1 or 2 for their own property. Professional one-on-one support from a farm advisor or consultant is required to prepare a LEP Level 3.

21.Our farm business has a significant documented history in completing and utilising industry FEPs. Blair completed one of the first "Meat & Wool NZ LEP Level 3". This was a voluntary program, he completed it himself and was audited and given Level 3 accreditation in 2010. He was audited annual for 3 years. Our farming business has been undertaking planned mitigations, stock exclusion and environmental enhancements for over 10 years – we have several years still planned ahead and perhaps will never be finished. Space planted poplar trees planted 35-40years ago now need to be cut down and replanted.
Nutrient budgets were completed in 2008/09 and 2009/10. A Greenhouse gas Overseer budget was also completed.

The process of developing our own LEP was time-consuming but allowed a great insight into the land we were farming and how to ensure our farming system was best aligned and suited the various land classes.

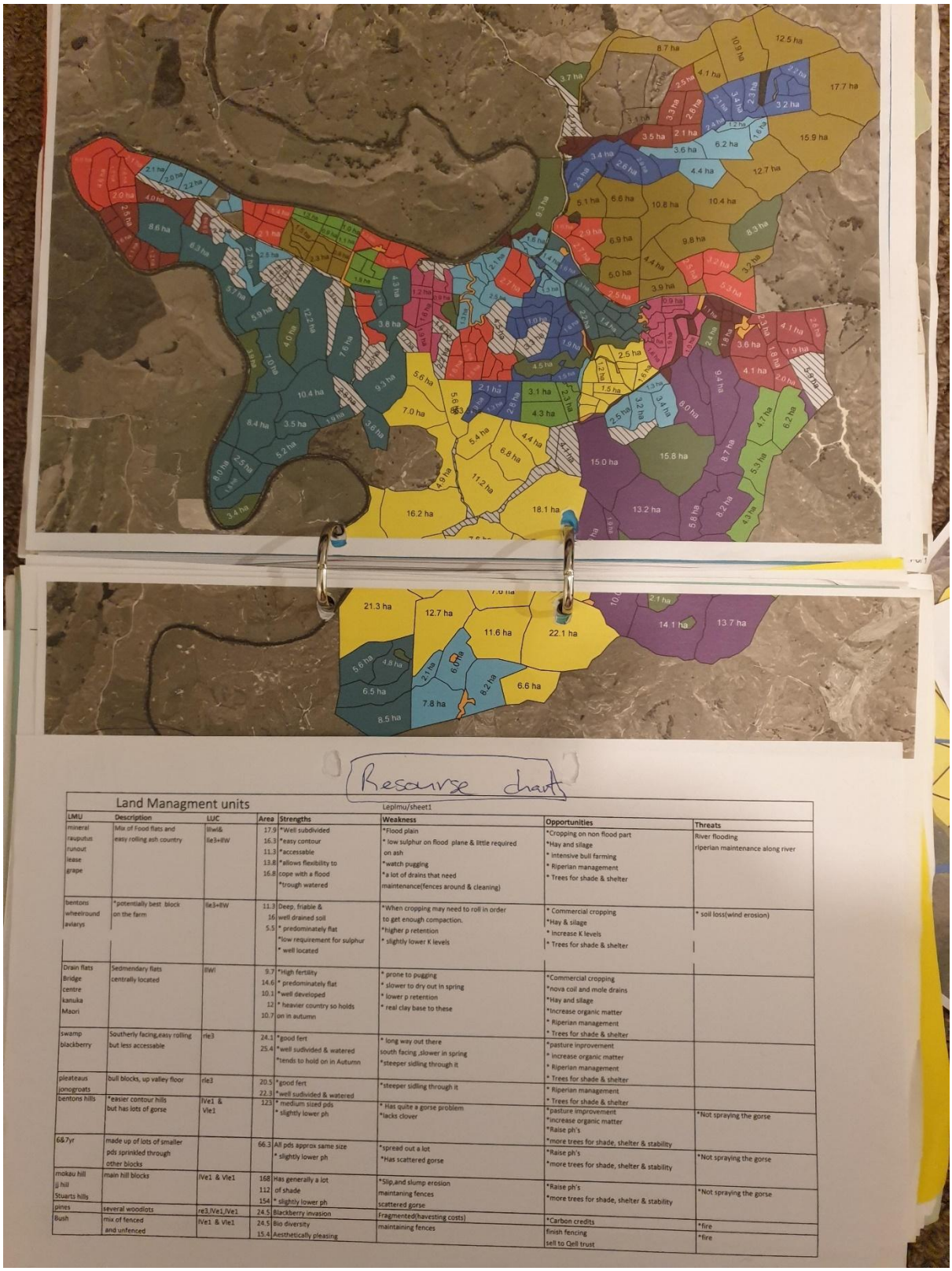

Figure 3. Meat & Wool NZ LEP level 3 Resource Chart 2009/10

22.In 2017 an updated Farm Plan was prepared by Groundstock with WRC & MPI (Hill Country Erosion Fund) support. (Document attached).
Included in the plan:

- Farm Overveiw; the plan identifies farm specific opportunities to manage our resources sustainably
- Land use assessment; this utilises the LUC classification system, although due to a lack of mapping at the scale required an intermediary Land Resource Inventory (LRI) step is required. Land is divided into separate units based on soil, geology, slope and vegetation. It highlights strengths, limitations and erosion risk. Appropriate land use is recommended, potentially stocking rate or intensity and an appropriate environmental mitigation measure can also be matched to the LUC unit.
- Environmental treatment plan; this section gives detail around the environmental issues on our farm and best practice management actions to mitigate the issues. Examples currently in use include space planting of poplars and willows over unstable hill country and gullies, riparian fencing and planting and critical source area management
- Environmental best practice; a general description of best practice mitigations.

This is a basic document with water quality objectives as the driver. As a farm business we require further planning around biodiversity, healthy soils and carbon neutrality. We need to align all this with our families values and goals.

23. We became involved in the process of completing an LEP so we could prove our good environmental management to overseas consumers. It provided a record of the higher priority work we had completed and additional work still to do. Actions and timeframes were clearly established. Developing further knowledge around soils and geology allowed Blair to separate the farm into management units based around the farm's natural capital.

24.The process of regular review and auditing was very useful. We propose farmers in catchment groups could gather annually for a facilitated review of their LEP. This has already been discussed in the Lower Mokau sub-catchment group.

25.Figure 1 shows examples of some of the mitigations we have carried out on farm; including space planting of willows, riparian fencing and planting, native bush regeneration, land retirement, steam bank planting and sub-catchment planning in progress. Further examples follow in Figure 4.

Figure 4. Examples of mitigations on farm

iii. Nitrogen Reference point and nutrient management

26.We oppose the PC1 grandparenting approach (holding users to their Nitrogen Reference Point). It penalizes the low emitters – who will no longer be able to develop their farms to help pay for the cost of mitigating against the other contaminants. It allows existing high discharge rates to continue and limits the flexibility of other enterprises which may have low emission rates. This rewards existing polluters.

27.We support the use of LEP's utilising LUC to determine emission targets for each farm, and science to determine which contaminants are an issue in each catchment. If nitrogen discharges from a property do have to be allocated, then base the allocation system on the natural capital of soils and the water quality outcomes that are to be achieved for each catchment.

In the short-term we would support use a "hybrid" type model to lower emissions from higher emitters via grandparenting whilst transferring to a natural land capital approach. A realistic timeframe for change will be required; possibly 1% reduction per year but reflecting actual catchment contaminant loading.

28.Amend the rules so that they are effects and science based, not based on grandparenting which acts to tie in existing land use, reduces land use flexibility and reduces land values. The ability to adapt and innovate by rural communities and individuals (Eg markets, climate change, farm succession) is seriously threatened by a grandparenting approach.

iv. Stock Exclusion

29.We do not support mandatory stock exclusion through fencing in the hill country and extensive farming systems as this approach does not take into account the natural landscape, the farm system and is not effects based. Our farm has a comprehensive water reticulation system and tailored critical source area management in the hill country, we are conscious of overland flow pathways taken by sediment, phosphorous and pathogens and work to mitigate these. In addition we have completed stock exclusion for 80-85% of our easy country.

30.The governments Clean Water Report document (February 2017) includes recommendations for national stock exclusion, which appear more workable and make stock exclusion more achievable. We advocate where fencing is required amend the stock exclusion requirements so that they are consistent with the Governments Clean Water Report (February 2017). Change the slope requirements to no greater than 15° as per the Clean Water Report. For cattle and deer on land between 3 and 15 degrees slope change the exclusion requirements so that they only apply to all permanently flowing waterbodies. The addition of intermittently flowing waterbodies, and definition of this, in Section 42A is a significant concern on hill properties and those with low stocking rates.

31.There are areas of water on our farms that would require fencing under current rules that seem nonsensical. Fencing them would be a health and safety issue, financially crippling, and environmentally destructive. The fenced off land could harbour noxious weeds such as gorse, blackberry, convolvulus and tutsan if no longer controlled by stock. Weed control of the buffer area would be challenging (and is proving to be currently) and excluded areas could also cause a fire risk. Both the fencing and the weeds would limit recreational access for swimming, fishing and kai gathering by ourselves and local whanau.

32. Blanket riparian setbacks and any requirements to plant are opposed, in favour of tailored approaches through Land Environment Plans. We believe there are other mitigation methods that could be utilized and would be more effective – including good stock management (based on the contour and time of year to minimize the risk of erosion), reticulated stock water, pole planting, sediment traps, retirement of land etc. These have been utilised on our property and are incorporated in our LEP.

33.My preference is a stocking rate or kilograms of liveweight per hectare approach. In our business all land carrying cattle at a stocking rate higher than 15-16su has cattle excluded or planned to be excluded. We have completed 80-85% of this, where the fencing is not yet complete there is always trough water available situated away from the waterway.
The property includes over 27km of ephemerals and 9km of Mokau river frontage.

****

35.Farmers are very good at working out how to solve problems, adapt and innovate on their properties. We advocate for policies and rules that support and encourage farmer adaptation. As it stands PC1 does not provide for flexibility to support individuals and communities to adapt and manage future challenges and opportunities. It also fails to provide certainty and confidence as we consider the future of farming in our region.

We acknowledge the goals set in the Vision and Strategy for the Waikato River. We agree that our rivers and waterways need to be healthy; along with healthy soils, thriving biodiversity and reduced greenhouse gas emissions. We all need to be responsible and accountable for making the necessary changes. Our communities and our children are relying on us to do so. Thank you.